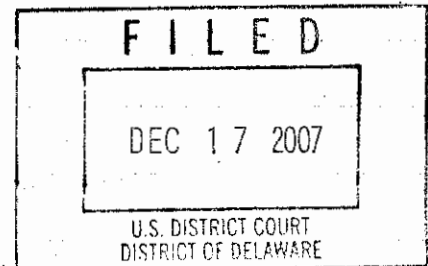


From: James W. Riley
Delaware Correctional Center
1181 Paddock Road
Smyrna, Delaware 19977

CA 06-01 GMS

To: Kevin J. Connors, Esq.
1220 North Market St., 5th Fl.
P.O. Box 8888
Wilmington, Delaware 19899-8888



November 9, 2007

Re: Riley v. Taylor, et al.,
C.A. No. 06-001-GMS
(Defendants' Discovery Requests Are Premature)

Dear Mr. Connors,

I am in receipt of your discovery requests: (1) Request For Production Of Documents; (2) Request For Admissions and (3) First Set of Interrogatories.

Plaintiff Riley cannot answer any of medical defendants' requests until defendants provide the information requested in plaintiff's October 15, 2007 motion For Production Of Documents and First set of Interrogatories.

Many of defendants' requests relates to plaintiff's access to medical treatment in which defendants refuse to provide. Plaintiff contend that his request for production of documents seek to obtain access to the records relating to recent visits with the Delaware

Correctional Center CMS' doctors. That information will reveal that defendants still have not provided plaintiff any adequate treatment for his rectal dysfunction and degraded eye vision. Also defendants have not provided plaintiff with orthopedics boots and have previously indicated to the Court in a November 13, 2006, Letter, that they will not provide plaintiff with any more orthopedic footwear after fulfilling the first doctor's request for orthopedics tennis shoes as a compliment of the Court's Order directing defendants to Report on the Status of Riley's medical treatment.

Since that date (last November 2006) defendants have not provided plaintiff any medical treatment for the painful rectal dysfunction or treatment for the degrading eye vision.

Just recently the medical staff have told plaintiff that they do not possess the expertise to treat plaintiff's medical conditions. The doctor that examined plaintiff's rectum condition and discovered a large lump inside his rectum & swelling, referred him to be seen by an outside Specialist. However this doctor indicated that it will take a long time to get this referral approved by the CMS' director.

This delay in seeing a Specialist is a typical long standing policy and practice of CMS which resulted in a substantial number of prisoners' deaths. Thus, in 2006 the Delaware Department of Corrections and CMS

have enter into a settlement agreement with the United State Justice Department to refrain from such policy and practice.

Defendants were put on notice of plaintiff's medical claims dating back from 2002 to the present date and still defendants have not rendered any adequate medical treatment.

This being the current state of events, plaintiff cannot fulfill defendants' requests for Production of Documents, Admissions and interrogatories.

Plaintiff cannot provide records on medical treatment he did not receive as of to date. Defendants' discovery requests are therefore unreasonable, a form of harassment, a waste of time and ludicrous. You're making the discovery process into a Circus!

An appropriate motion will be filed with the Court to strike your discovery requests. However, I'll give you until November 30, 2007, to convince your clients to have me (the Plaintiff) examined by outside Specialist who is qualified to diagnose the cause, extent and pain & suffering associated my medical conditions. Then the parties can make appropriate litigations based upon these medical experts examinations, reports and what treatments should have been provided long ago.

CC:

Ophelia M. Waters, Esq. (DAG)

Thank You!
James W. Riley
Plaintiff

Certificate of Service

I, James R. Riley, hereby certify that I have served a true and correct cop(ies) of the attached: Plaintiff's Motion To Amend The Court's Scheduling Order upon the following parties/person (s):

TO: Dphelia M. Waters
Deputy Attorney General
Department of Justice
820 N. French St.
Wilmington, Delaware
19801

TO: _____

TO: Kevin J. Connors
1220 W. Market St., 5th Fl.
P.O. Box 8888
Wilmington, Delaware
19899-8888

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 13 day of December, 2007

James Riley